

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

The CALIFORNIA INSTITUTE OF  
TECHNOLOGY,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.

Defendants.

Case No. 2:21-CV-0446-JRG

**JURY TRIAL DEMANDED**

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

Plaintiff The California Institute of Technology (“Plaintiff”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Defendants”) (collectively, “the Parties”) hereby file this Joint Motion to Stay All Deadlines and Notice of Settlement.

The Parties have reached a settlement in principle of all matters in controversy between the Parties and are in the process of finalizing the documents pertaining to the settlement. The Parties wish to conclude the settlement without burdening the Court with additional filings and without incurring unnecessary expense. The Parties anticipate they will be able to submit the dismissal papers by September 7, 2023. Accordingly, the Parties respectfully request that the Court grant a brief stay of all proceedings between the Parties, including all pending deadlines between the Parties until September 7, 2023.

The Parties submit that good cause exists for granting this Motion, as set forth above. The Motion is not filed for the purposes of delay but rather so that justice may be served.

Accordingly, the Parties respectfully request that the Court enter the proposed order submitted with this Joint Motion and grant the Parties such other and further relief to which they are entitled.

Dated: August 8, 2023

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Respectfully submitted,

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**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for the Parties have complied with Local Rule CV-7(h). The Parties are jointly seeking the relief sought in this Motion.

/s/ Melissa R. Smith

Melissa R. Smith

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system per Local Rule CV-5(a)(3) this August 8, 2023.

/s/ Melissa R. Smith

Melissa R. Smith